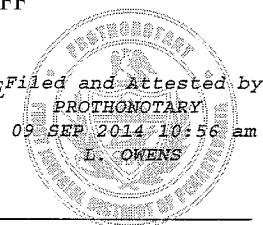


EXHIBIT A

PASQUALE J. COLAVITA, P.C.
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ATTORNEY FOR PLAINTIFF

THIS IS A MAJOR NON JURY TRIAL CASE



ERICA YOUNG

Plaintiff,

vs.

WAL-MART STORES EAST, LP

Defendants.

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY
CIVIL ACTION

CASE I.D. NO.: 140801130

**2S – PREMISES LIABILITY – SLIP AND FALL
AMENDED COMPLAINT**

NOTICE

YOU HAVE BEEN SUED IN COURT. IF YOU WISH TO DEFEND AGAINST THE CLAIMS SET FORTH IN THE FOLLOWING PAGES, YOU MUST TAKE ACTION WITHIN TWENTY (20) DAYS AFTER THIS COMPLAINT AND NOTICE ARE SERVED, BY ENTERING A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILING IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. YOU ARE WARNED THAT IF YOU FAIL TO DO SO THE CASE MAY PROCEED WITHOUT YOU AND A JUDGMENT MAY BE ENTERED AGAINST YOU BY THE COURT WITHOUT FURTHER NOTICE FOR ANY MONEY CLAIMED IN THE COMPLAINT OR FOR ANY OTHER CLAIM OR RELIEF REQUESTED BY THE PLAINTIFF. YOU MAY LOSE MONEY OR PROPERTY OR OTHER RIGHTS IMPORTANT TO YOU.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

PHILADELPHIA BAR ASSOCIATION
LAWYER REFERRAL AND INFORMATION SERVICE
1101 MARKET STREET, 11TH FLOOR
PHILADELPHIA, PENNSYLVANIA 19107
TELEPHONE: (215) 238-1701

AVISO

LE HAN DEMANDADO A USTEE EN LA CORTE. SI USTED QUIERE DEFENDERSE DE ESTAS DEMANDAS EXPUESTAS EN LAS PAGINAS SIGUIENTES, ESTED TIENE VIENTE (20) DIAS DE PLAZO AL PARTIR DE LA FECHA DE LA DEMANDA Y LA NOTIFICACION. HACE FALTA ASENTAR UNA COMPARENCIA ESCRITA O EN PERSONA O CON UN ABOGADO Y ENTREGAR A LA CORTE EN FORMA ESCRITA SUS DEFENSAS O SUS OBJECIONES A LAS DEMANDAS EN CONTRA DE SU PERSONA. SEA AVISADO QUE SI USTED NO SE DEFIENDE, LA CORTE TOMARA MEDIDAS Y PUEDE CONTINUAR LA DEMANDA EN CONTRA SUYA SIN PREVIO AVISO O NOTIFICACION. ADEMAS, LA CORTE PUEDE DECIDIR A FAVOR DEL DEMANDANTE Y REQUIERE QUE USTED CUMPLA CON TODAS LAS PROVISIONES DE ESTA DEMANDA. USTED PUEDE PERDER DINERO O SUS PROPIEDADES U OTROS DERECHOS IMPORTANTES PARA USTED.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

ASOCIACION DE LICENCIADOS DE FILADELFA
Servicio De Referencia E Informacion Legal
1101 MARKET STREET, 11TH FLOOR
PHILADELPHIA, PENNSYLVANIA 19107
TELEPHONE: (215) 238-1701

COMPLAINT

Plaintiff, ERICA YOUNG, by and through his counsel, Pasquale J. Colavita, Esquire, hereby file the following Complaint against the above named Defendant upon the following averments of fact:

1. Plaintiff, ERICA YOUNG is an adult individual residing at 3850 Woodhaven Road, Unit #706, Philadelphia, Pennsylvania 19154.

2. At all times relevant hereto, Defendant WAL-MART STORES EAST, LP (hereinafter referred to as WALMART) is a corporation with offices at 702 SW 8th Street, Bentonville, AZ 72716 and is doing business in the Commonwealth of Pennsylvania at 1 Franklin Mills Boulevard, Store#2650, Philadelphia, Pennsylvania.

3. At all times relevant hereto, Defendant WALMART owned, possessed, leased, maintained, controlled and/or had under its care and direction through their agents, servants, workmen and/or employees, acting in the course of their employment on the promotion of defendant's business, mission and/or affairs, the premises and business known as WALMART located at 1 Franklin Mills Boulevard, Store#2650, Philadelphia, Pennsylvania.

4. On or about September 4, 2012, at or about 11:30 p.m., Plaintiff ERICA YOUNG was a patron, guest and/or business invitee lawfully walking on Defendant WALMART'S premises and business known as WALMART located at 1 Franklin Mills Boulevard, Store#2650, Philadelphia, Pennsylvania when due to the negligence and carelessness of the Defendant, her foot came into contact with a slippery substance causing Plaintiff to slip, stumble and fall causing her to sustain personal injuries hereinafter more fully set forth.

5. On said date, it was the duty of Defendant WALMART to keep and maintain the walkways of said premises in a reasonably safe condition free and clear from slippery substances for the public to travel thereon, including the Plaintiff.

6. On said date, and for some time prior thereto, notwithstanding said duty of Defendant WALMART to keep and maintain said premises in a reasonably safe condition free and clear from slippery substances for the public to travel thereon, Defendant did negligently, carelessly and/or recklessly permit and allow the walkways to be covered with slippery substances and to be and remain in an unsafe condition.

7. As a result of the negligence and/or carelessness of the Defendant, Plaintiff ERICA YOUNG sustained the injuries to the following: left ankle, chest, arms, decreased strength and reduced range of motion of left ankle; total body disability; shock and injury to her nerves, emotional and nervous system, which injuries are of a permanent nature with permanent disabilities and loss of function; together with various other injuries, the exact extent of which are unknown at this time as she continues to consult with specialists to determine the exact extent of the injury and any required treatment.

8. As a result of the negligence and/or carelessness of Defendant, Plaintiff ERICA YOUNG has in the past suffered and will in the future suffer great pain; she has been in the past and will be in the future obliged to lay out, expend or incur diverse expenses, bills, monies or losses for medicines and medical attention in the effort to have herself treated for the aforesaid injuries. She has been in the past and will be in the future hindered from engaging in her usual and daily duties, occupations, pleasures and activities.

9. As a result of the negligence and/or carelessness of Defendant, Plaintiff ERICA YOUNG has or may hereafter incur other financial expenses or losses which do or may exceed amounts which he may otherwise be entitled to recover.

10. As a result of the negligence and/or carelessness of Defendant, Plaintiff ERICA YOUNG has suffered and will continue to suffer, a severe loss of earnings and/or impairment of earning capacity and/or power.

11. The injuries and damages sustained by the Plaintiff ERICA YOUNG were caused solely as a result of the negligence and carelessness of the Defendant WALMART by and through its agents, servants, workmen employees and/or subcontractors acting within the scope and course of their employment and business, which included but are not limited to the following:

- a. Allowing the dangerous condition to exist at the time and place set forth herein;
- b. Allowing the slippery foreign substance to remain upon said premises;
- c. Failing to maintain the walkway in a manner safe for those lawfully upon said premises;
- d. Failing to warn the Plaintiff of a dangerous condition of which it had, or should and could have had knowledge or notice of in time to have removed or remedied same;
- e. Failing to inspect the premises for defects and dangerous conditions;
- f. Failing to exercise care and caution required in allowing a slippery substance to remain upon the surface of the premises;
- h. Failing to take proper measures to prevent the Plaintiff from falling;
- i. Failing to anticipate the hazard to which Plaintiff was exposed;
- j. Failing to take proper remedial measures to make said premises safe for those lawfully upon said premises;
- k. Failing to issue and/or post adequate warning to alert those lawfully upon said premises of the dangerous condition which existed;
- l. Failing to exercise reasonable care and skill for personnel hired for the management of the premises;

m. Failing to adequately train, hire and maintain personnel for the operation of the Defendant's business;

n. Failing to adequately train, hire and maintain personnel for the removal of dangerous conditions from said premises;

o. Failing to adequately supervise personnel hired for the Defendant's business.

WHEREFORE, Plaintiff ERICA YOUNG demands judgment in her favor against Defendant WALMART in an amount in excess of the Arbitration Limit together with interest, costs, attorney fees and delay damages.

PASQUALE J. COLAVITA, P.C.

Dated: September 9, 2014

BY: /Pasquale J. Colavita/
PASQUALE J. COLAVITA, ESQUIRE
Attorney for Plaintiff

VERIFICATION

I, Erica Young, Plaintiff, hereby verify that the statements set forth within are true and correct to the best of my knowledge, information and belief.

The foregoing statements are made subject to the penalties of 18 Pa.C.S. §4904 relating to unsworn falsification to authorities.

Dated: 9/9/14


Erica Young, Plaintiff

CERTIFICATE OF SERVICE

I, PASQUALE J. COLAVITA, ESQUIRE, attorney for Plaintiff, hereby certify that a true and correct copy of Plaintiff's Amended Complaint was sent via email and the court's electronic notification upon the following:

Marc Kamin, Esquire
mkamin@mcdalaw.com
McDonnell & Associates, P.C.
Metropolitan Business Center
860 1st Avenue, Suite 5B
King of Prussia, PA 19406

PASQUALE J. COLAVITA, P.C

Dated: September 9, 2014

By: /Pasquale J. Colavita/
PASQUALE J. COLAVITA, ESQUIRE
Attorney for Plaintiff